

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LONGHORN HD LLC.,

Plaintiff,

V.

INSPUR GROUP CO. LTD.,

Defendant.

Case No. 2:20-cv-00019-JRG

JURY TRIAL DEMANDED

**PLAINTIFF’S LONGHORN HD LLC’S REQUEST FOR
ENTRY OF DEFAULT**

Plaintiff Longhorn HD LLC. (“LHD” or “Plaintiff”), pursuant to the Local Civil Rules and Rule 55 of the Federal Rules of Civil Procedure, respectfully files this Motion for entry of Default Judgment and Default Judgment against Defendant Inspur Group Co. Ltd. (“Inspur” or “Defendant”).

1. On January 24, 2020, LHD filed the present complaint (“Complaint”) against Inspur for infringement of U.S. Patent Nos. 6,734,597 (Dkt. 1, ¶ 19), 6,549,400 (*Id.*, ¶ 29), 6,711,012 (*Id.*, ¶ 38), and 6,938,104 (*Id.*, ¶ 47).

2. LHD has translated the Complaint and formally served Inspur through the Hague Convention because Inspur is a Chinese company with no locations in the United States. Longhorn researched and retained a company to translate the Patents-In-Suit, the Complaint, and the summons into Chinese and a company to serve the translated documents through the Hague Convention.

3. LHD retained Legal Language Services, a Division of ALS International Inc. to serve the complaint on Inspur.

4. On or about February 12, 2020, Mr. Tom R. McLean, Esq. of Legal Language Services submitted a request for service abroad of judicial or extrajudicial documents on behalf of LHD in this matter. LHD's request was directed to Inspur Group Co. LTD located at North Building, 4th Floor, Inspur Group Building 6, No. 1036, Lang-Chao-Road, high-tech Zone, Jinan, Shandon, 250101, People's Republic of China. The request included (1) an execute request, (2) a Certificate, (3) a Summary, (4) a Notice, (5) the Summons for this case in both English and Chinese, (6) the Complaint in this case in both English and Chinese, and the Civil Cover Sheet for this case in both English and Chinese. (Ex. 1).

5. The documents were delivered to Inspur on August 26, 2020. Despite receiving service of the documents, Inspur "refused to accept the documents." (Ex. 2).

6. Inspur failed to respond to the complaint within 21 days and has not reached out to Longhorn's counsel as of November 2020.

WHEREFORE, Plaintiff respectfully requests that the Clerk enter default against Defendant Inspur, on the record pursuant to Fed. R. Civ. P. 55(a)

Dated: November 20, 2020

Respectfully submitted,

/s/ Vincent J. Rubino, III

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**ATTORNEYS FOR PLAINTIFF,
LONGHORN HD LLC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 20, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Vincent J. Rubino, III
Vincent J. Rubino, III